

The logo for Hogan Lovells, featuring the firm's name in a serif font on a yellow rectangular background.

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October 6, 2019

By Case Management / Electronic Case Files System

The Honorable Madeline Cox Arleo
United States District Court for the District of New Jersey
Martin Luther King Building & U.S. Courthouse
50 Walnut Street
Newark, NJ 07102

Re: *In re American Medical Collection Agency, Inc. Customer Data Security Breach Litigation*, 2:19-md-02904-MCA-MAH

Dear Judge Arleo:

In support of the points made by Defendants at the October 1, 2019 Initial Case Management Conference—specifically (1) that Defendants are unaware of any well-known data breach of similar size in which plaintiff's leadership structure for the consumer actions was as large as the twenty-two (22) firms proposed here, and (2) that the large structure proposed here could lead to inefficiencies for the Parties and the Court—please find enclosed Exhibit 1, which Defendants file at Your Honor's request. This Exhibit summarizes the size and structure of plaintiffs' leadership structures in recent data breach multidistrict litigations ("MDL"), including the number of firms responsible for the consumer actions, and includes the structure proposed in this MDL for comparison.

Respectfully submitted,

/s/ Allison Ryan

Allison Ryan

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and Laboratory Corporation of America*

cc: Counsel of Record

Enclosure